

## Baker & McKenzie LLP

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Via ECF

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The Honorable Alison J. Nathan United States District Judge **United States District Court** Southern District of New York 40 Foley Square

New York, New York 10007

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Associated Firm In cooperation with Trench, Rossi e Watanabe

Advogados

Dear Judge Nathan:

We represent plaintiffs KCG Holdings, Inc. and KCG Americas LLC ("KCG" or "Plaintiffs") in the above-captioned matter. We write in response to Defendant Rohit Khandekar's January 11, 2018 letter, in which he asserts that KCG failed to comply with the Court's December 28, 2017 Order.<sup>1</sup>

Re: KCG Holdings, Inc. et al. v. Khandekar

1:17-civ-3533 (AJN) (GWG)

On December 28, 2017, the Court issued an Order stating that, by January 11, 2018, "any party that requests redactions to [Defendant's summary judgment papers] shall explain to the Court why those documents at issue need to be redacted." [Dkt. 128]. On January 11, 2018, Plaintiffs filed a letter explaining that they sought their requested redactions to protect proprietary or trade secret information. [Dkt. 136]. Under 4.-A. of the Court's individual practices, redactions of trade secret and proprietary information do not require Court approval.

It is our understanding that Plaintiffs' January 11, 2018 letter complies with the Court's December 28, 2017 Order. If, however, the Court requires further information regarding Plaintiffs' redactions to Defendant's summary judgment papers, please let us know.

We are available at the Court's convenience to address any questions.

<sup>&</sup>lt;sup>1</sup> Defendant's January 12, 2018 letter also addresses the issue of whether Defendant's Predictors must be filed with the Court. As both parties have now addressed this issue in letters to the Court, we do not address it again herein.



Respectfully submitted,

By: <u>/s/ Jacob M. Kaplan</u> William F. Dugan (pro hac vice)

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